

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE WORLD TRADE CENTER DISASTER	: 21 MC 100 (AKH)
SITE LITIGATION	: (All Cases)
:	:
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IN RE WORLD TRADE CENTER LOWER	: 21 MC 102 (AKH)
MANHATTAN DISASTER SITE LITIGATION	: (All Cases)
:	:
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IN RE COMBINED WORLD TRADE CENTER	: 21 MC 103 (AKH)
AND LOWER MANHATTAN DISASTER SITE	: (All Cases)
LITIGATION (straddler plaintiffs)	:
:	:
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ATTORNEY AFFIRMATION

Paul J. Napoli, an attorney duly licensed to practice before the Courts of the State of New York and a member of the bar of this Honorable Court, hereby affirms the following to be true under penalty of perjury or, as to those matters asserted upon information and belief, believe to be true:

1. I am a member of *Worby Groner Edelman & Napoli Bern, LLP*, and Co-Liaison Counsel for the plaintiffs in the above-referenced matters.
2. This Affirmation is presented pursuant to this Court's June 25, 2010 Order entitled "Protocol For Regulating Attorneys' Fees and Allowances of Expenses".
3. Enclosed with this Affirmation is a disc containing the schedule of expenses incurred on behalf of all Plaintiffs in these matters (referred to as the "Common Benefit Expenses" or "General Expenses"). Those expenses currently total \$1,756,224.67.
4. These expenses were charged by or paid to outside vendors by *Worby Groner Edelman & Napoli Bern, LLP* on behalf of all Plaintiffs in the above-referenced matters.

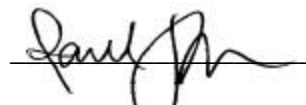
5. Worby Groner Edelman & Napoli Bern, LLP continues to incur numerous expenses on behalf of all Plaintiffs in the above-referenced matters, including, but not limited to, expenses for the fees paid to the Court-appointed Special Masters, TCDI, Inc. for ongoing maintenance of the Court's database, to court reporters for transcripts and other expenses.

6. Worby Groner Edelman & Napoli Bern, LLP will supplement this schedule as a result of these continuing expenses that are being incurred on behalf of all Plaintiffs in the above-referenced matters.

7. This schedule is being submitted to the Court in an un-redacted form for *in camera* inspection at the Court's direction. A redacted version of the schedule, prepared to protect certain privileges, will be provided shortly thereafter to all of the persons entitled to receive a copy of the same pursuant to the Court's Order of June 25, 2010 Order.

8. The Plaintiffs respectfully reserve all of their rights and objections to this Court's jurisdiction over this settlement and no waiver of the same shall be implied or construed by this filing.

Dated: New York, New York
July 23, 2010


Paul J. Napoli